# **EXHIBIT F**

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

· Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN, DUSTIN MOSKOVITZ, ANDREW MCCOLLUM, CHRISTOPHER HUGHES, and THEFACEBOOK, INC.,

Defendants.

MARK ZUCKERBERG, and THEFACEBOOK, INC., Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER WINKLEVOSS, and DIVYA NARENDRA.

Additional Counterdefendants.

CIVIL ACTION NO. 1:04-cv-11923 (DPW)

# PLAINTIFF AND COUNTERCLAIM DEFENDANTS' <u>INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)</u>

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiff ConnectU LLC and Counterclaim Defendants ConnectU LLC, Cameron Winklevoss, Tyler Winklevoss, and Divya Narendra (collectively, solely for purposes of this disclosure, "ConnectU") make the following Initial Disclosures to Defendants Mark Zuckerberg, Eduardo Saverin, Dustin

Moskovitz, Andrew McCollum, Christopher Hughes, and TheFaceBook, Inc., and Counterclaim Plaintiffs Mark Zuckerberg and TheFaceBook, Inc. (collectively, "TheFaceBook").

These Initial Disclosures are preliminary in nature. To the best of ConnectU's knowledge, information, and belief, formed after reasonable inquiry, the disclosures are complete and correct as of the time they are made. ConnectU reserves the right to amend and/or supplement these disclosures as pertinent facts become known in the future, as contemplated by Federal Rule of Civil Procedure 26(e).

By specifying that certain documents are located in the offices of ConnectU's counsel,

ConnectU does not waive attorney-client privilege or work product immunity with respect to any
such documents or the subject matter thereof.

#### A. 26(a)(1)(A): Witnesses

At present, ConnectU has identified the following persons as persons who may have discoverable information that ConnectU may use to support its Complaint and defend against the counterclaims. ConnectU reserves the right to amend this list.

NAME/ADDRESS	TITLE	SUBJECT MATTER
Cameron Winklevoss 10 Khakum Wood Rd. Greenwich, CT 06831	Founder, ConnectU LLC	All subjects relevant to Complaint and Counterclaims
Tyler Winklevoss 10 Khakum Wood Rd. Greenwich, CT 06831	Founder, ConnectU LLC	All subjects relevant to Complaint and Counterclaims
<b>Divya Narendra</b> 16 Park Avenue New York, NY 10016	Founder, ConnectU LLC	All subjects relevant to Complaint and Counterclaims
Victor Gao 927 N. Sycamore Street Arlington, VA 22207	Software Programmer	Development of the Harvard Connection website and software
Sanjay Mavinkurve 916 Oakes Street Palo Alto, CA 94303	Software Programmer	Development of the Harvard Connection website and software

Yogonh Tashasa	C - C D	
Joseph Jackson	Software Programmer	Harvard Connection Software
Harvard University		
Pforzheimer House		
56 Linnaean Street		
Cambridge, MA 02138		
Lawrence H. Summers	President, Harvard University	Mr. Summer's consideration of the
Massachusetts Hall		dispute between the parties
Cambridge, MA 02138		
John T. O'Keefe	Assistant Dean and Secretary,	Harvard Administrative Board's
Massachusetts Hall	Harvard Administrative Board	consideration of the dispute between the
Cambridge, MA 02138		parties
Melinda Gray	House Tutor,	Harvard Administrative Board's
Current Address Unknown	Harvard University	consideration of the dispute between the
		parties
Timothy J. McGinn	Staff Writer, Harvard Crimson	Comments by the parties to the press
The Harvard Crimson		parties to the press
14 Plympton Street		
Cambridge, MA 02138		
Shirin Sharie	Desk Editor, The Stanford Daily	Commonts by the most of to the
The Stanford Daily	Besk Editor, The Stamord Barry	Comments by the parties to the press
Storke Publications		
Bldg., Suite 101		
Stanford, CA 94305		
	C. CCAYA	
Marcella Bombardieri	Staff Writer, The Boston Globe	Comments by the parties to the press
The Boston Globe		
135 Morrissey Blvd.		
Boston, MA 02125	0 00 00	
	Staff Writer, Harvard Crimson	Comments by the parties to the press
The Harvard Crimson		
14 Plympton Street		
Cambridge, MA 02138		
	Unknown	Development and funding of
c/o TheFaceBook, Inc.		thefacebook.com
471 Emerson Street		
Palo Alto, CA		
	Unknown	Development and funding of
California Institute of		thefacebook.com
Technology		
Lloyd House		
Pasadena, CA 91126		
Jonathan Abrams	Unknown	Development and funding of
c/o Friendster, Inc.		thefacebook.com
1380 Villa Street		
Mountain View, CA 94041		

Marc Pierrat	Director of Marketing and	Software development for connectu.com
iMarc LLC	Business Development	·
14 Inn Street		
Newburyport, MA		
01950		

## B. 26(a)(1)(B): Documents

At present, ConnectU has identified the following documents, data compilations, and tangible things that are in ConnectU's possession, custody, or control that ConnectU may use to support its claims. ConnectU reserves the right to amend this list.

DESCRIPTION OF DOCUMENTS	LOCATION
Documents relating to the creation and development of the	On the business premises of ConnectU
Harvard Connection and ConnectU business plan(s)	LLC
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	At the home of Cameron Winklevoss
	At the home of Tyler Winklevoss
	At the home of Divya Narendra
	Finnegan Henderson et al.
	Washington, DC
Documents relating to the creation and development of the	On the business premises of ConnectU
Harvard Connection and ConnectU software and website	LLC
	At the home of Cameron Winklevoss
	At the home of Tyler Winklevoss
	At the home of Divya Narendra
	At the home of Victor Gao
	Finnegan Henderson et al.
	Washington, DC
Documents relating to the Copyright Registration for the	On the business premises of ConnectU
work entitled Harvard Connection Code (Reg. No. TXu-196-126)	LLC
	Finnegan Henderson et al.
	Washington, DC

Documents relating to the business relationship between	0.4-1.:
ConnectU and TheFaceBook	On the business premises of ConnectU LLC
	At the home of Cameron Winklevoss
	At the home of Tyler Winklevoss
	At the home of Divya Narendra
	At the home of Victor Gao
	Finnegan Henderson et al. Washington, DC
Documents relating to the business, operations, and marketi	ng On the husiness premises of Connect I
of ConnectU LLC	LLC
	At the home of Cameron Winklevoss
	At the home of Tyler Winklevoss
	At the home of Divya Narendra
	Finnegan Henderson et al. Washington, DC
Media coverage of TheFaceBook.com, ConnectU.com, and the dispute between the parties	On the business premises of ConnectU LLC
	At the home of Cameron Winklevoss
	At the home of Tyler Winklevoss
	At the home of Divya Narendra
	Finnegan Henderson et al. Washington, DC
Documents relating to the parties' proceedings before the Harvard Administrative Board	On the business premises of ConnectU LLC
	At the home of Cameron Winklevoss
	At the home of Tyler Winklevoss
	At the home of Divya Narendra
	Harvard University
	Finnegan Henderson et al. Washington, DC

### C. 26(a)(1)(C) Calculation of Damages

ConnectU cannot calculate its damages prior to obtaining discovery materials from TheFaceBook and obtaining expert opinions regarding the value of TheFaceBook, Inc.

#### D. 26(a)(1)(D): Insurance

ConnectU is not aware of any applicable insurance policies at this time.

DATED this 7th day of April, 2005

Lawrence R. Robins (BBO# 632610)

Jonathan M. Gelchinsky (BBO# 656282)

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Attorneys for Plaintiff and Counterclaim Defendants

### **CERTIFICATE OF SERVICE**

I, Jonathan M. Gelchinsky, hereby certify the	hat on April 7, 2005, a true and correct copy			
of the foregoing PLAINTIFF AND COUNTERCLAIM DEFENDANTS' INITIAL				
DISCLOSURES PURSUANT TO FED. R. CIV. P	2. 26(a) was served by the indicated means to			
the persons at the addresses listed:				
Daniel K. Hampton, Esq. Gordon P. Katz, Esq. HOLLAND & KNIGHT, LLP 10 St. James Avenue Boston, MA 02116	<ul><li>☐ Via First Class Mail</li><li>☐ Via Hand Delivery</li><li>☐ Via Overnight Courier</li><li>☐ Via Facsimile</li></ul>			
Robert B. Hawk, Esq. HELLER EHRMAN, LLP 275 Middlefield Road Menlo Park, CA 94025	<ul><li>☐ Via First Class Mail</li><li>☐ Via Hand Delivery</li><li>☐ Via Overnight Courier</li><li>☐ Via Facsimile</li></ul>			

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